

Frank H. Stoy

From: langtont@gtlaw.com
Sent: Thursday, July 1, 2021 11:28 AM
To: mpendley@levinlaw.com; dnigh@levinlaw.com; lmassey@levinlaw.com
Cc: coatesg@gtlaw.com; lagosa@gtlaw.com; knightch@gtlaw.com; lockardv@gtlaw.com; spapantonio@levinlaw.com
Subject: RE: Ronald (Sandra) Meeks deposition date

Hi Madeline,

I'm open to discussion about that. I think it would be preferable for the court reporter to be present (I'm not sure if Veritext would be willing to confirm that the court reporter would be vaccinated, but that's something I could explore), but again, I'm open to discussion. It has obviously worked for Zoom depositions for the videographer to be remote; the only issue I foresee with that where counsel is in person is that the witness would not necessarily be looking directly at the camera, but we could probably set the room up so that we could get close to that.

Best,
Tori

From: Madeline Pendley <mpendley@levinlaw.com>
Sent: Thursday, July 1, 2021 11:19 AM
To: Langton, Tori (OfCnl-ATL-LT) <langtont@gtlaw.com>; Daniel Nigh <dnigh@levinlaw.com>; Lauren Massey <lmassey@levinlaw.com>
Cc: Coates, Gregory (Assoc-NJ-LT) <coatesg@gtlaw.com>; Lagos, Alexandra B. (Shld-MIA-LT) <lagosa@gtlaw.com>; Knight, Cheryl (LegalAsst-Atl-LT) <knightch@gtlaw.com>; Lockard, Victoria D. (Shld-Atl-LT) <lockardv@gtlaw.com>; Sara Papantonio <spapantonio@levinlaw.com>
Subject: RE: Ronald (Sandra) Meeks deposition date

Hi Tori,

Do you plan on having the court reporter and trial tech attend in person?

Thanks,
Madeline

From: langtont@gtlaw.com <langtont@gtlaw.com>
Sent: Thursday, July 1, 2021 9:53 AM
To: Madeline Pendley <mpendley@levinlaw.com>; Daniel Nigh <dnigh@levinlaw.com>; Lauren Massey <lmassey@levinlaw.com>
Cc: coatesg@gtlaw.com; lagosa@gtlaw.com; knightch@gtlaw.com; lockardv@gtlaw.com; Sara Papantonio <spapantonio@levinlaw.com>
Subject: RE: Ronald (Sandra) Meeks deposition date

Hi Madeline,

I'm following up on when you are available for a meet and confer on this. I have availability today and tomorrow except from 12-1 and 3-4 EDT.

Best,

Tori

From: Langton, Tori (OfCnl-ATL-LT)
Sent: Wednesday, June 30, 2021 12:09 PM
To: 'Madeline Pendley' <mpendley@levinlaw.com>; Daniel Nigh <dnigh@levinlaw.com>; Lauren Massey <lmasey@levinlaw.com>
Cc: Coates, Gregory (Assoc-NJ-LT) <coatesg@gtlaw.com>; Lagos, Alexandra B. (Shld-MIA-LT) <lagosa@gtlaw.com>; Knight, Cheryl (LegalAsst-Atl-LT) <knightch@gtlaw.com>; Lockard, Victoria D. (Shld-Atl-LT) <lockardv@gtlaw.com>; Sara Papantonio <spapantonio@levinlaw.com>
Subject: RE: Ronald (Sandra) Meeks deposition date

Hi Madeline,

I would like to confer about this. As you know, Mrs. Meeks is an estate representative, and we are unaware of her being immunocompromised or having specific health issues that would make an in-person deposition unsafe. I am fully vaccinated (and can provide evidence of this if you and Mrs. Meeks feel that is necessary), and have proposed this deposition to take place in a large conference room to allow for social distancing. We are also open to other protocols you may propose so this deposition can take place safely and Mrs. Meeks can feel comfortable. As you probably know, current CDC guidelines provide that fully vaccinated people can safely gather in small groups without masks.

Please let me know when you are available for a meet and confer.

Best,
Tori

From: Madeline Pendley <mpendley@levinlaw.com>
Sent: Wednesday, June 30, 2021 11:23 AM
To: Langton, Tori (OfCnl-ATL-LT) <langtont@gtlaw.com>; Daniel Nigh <dnigh@levinlaw.com>; Lauren Massey <lmasey@levinlaw.com>
Cc: Coates, Gregory (Assoc-NJ-LT) <coatesg@gtlaw.com>; Lagos, Alexandra B. (Shld-MIA-LT) <lagosa@gtlaw.com>; Knight, Cheryl (LegalAsst-Atl-LT) <knightch@gtlaw.com>; Lockard, Victoria D. (Shld-Atl-LT) <lockardv@gtlaw.com>; Sara Papantonio <spapantonio@levinlaw.com>
Subject: RE: Ronald (Sandra) Meeks deposition date

Hi Tori,

I will be defending this deposition. Mrs. Meeks is not comfortable doing this deposition in person, and has specifically requested this take place via Zoom, so that is what we are going to do.

If you still feel the need to press the issue, I can make time this week to confer.

Thanks!
Madeline

From: langtont@gtlaw.com <langtont@gtlaw.com>
Sent: Monday, June 28, 2021 4:40 PM
To: Daniel Nigh <dnigh@levinlaw.com>; Madeline Pendley <mpendley@levinlaw.com>; Lauren Massey <lmasey@levinlaw.com>
Cc: coatesg@gtlaw.com; lagosa@gtlaw.com; knightch@gtlaw.com; lockardv@gtlaw.com; Sara Papantonio <spapantonio@levinlaw.com>
Subject: RE: Ronald (Sandra) Meeks deposition date

Please let us know the basis for the objection and when you are available to confer regarding the same. As you know, Judge Kugler ordered the parties to confer regarding the issue of in-person depositions and stated that Judge Vanaskie will be available for a call on the issue early this week if the parties are unable to reach agreement.

Best,
Tori

From: Daniel Nigh <dnigh@levinlaw.com>
Sent: Monday, June 28, 2021 5:39 PM
To: Langton, Tori (OfCnl-ATL-LT) <langtont@gtlaw.com>; Madeline Pendley <mpendley@levinlaw.com>; Lauren Massey <lmasey@levinlaw.com>
Cc: Coates, Gregory (Assoc-NJ-LT) <coatesg@gtlaw.com>; Lagos, Alexandra B. (Shld-MIA-LT) <lagosa@gtlaw.com>; Knight, Cheryl (LegalAsst-Atl-LT) <knightch@gtlaw.com>; Lockard, Victoria D. (Shld-Atl-LT) <lockardv@gtlaw.com>; Sara Papantonio <spapantonio@levinlaw.com>
Subject: RE: Ronald (Sandra) Meeks deposition date

Also, please include Sara Papantonio on any emails regarding the Meeks case. Thanks.

Best regards,

Daniel

Daniel Nigh

Shareholder

Levin, Papantonio, Thomas, Mitchell,
Rafferty & Proctor, P.A.
316 S. Baylen Street, Suite 600
Pensacola, FL 32502-5996
850.435.7013 (office)
850.436.6013 (fax)
dnigh@levinlaw.com



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From: Daniel Nigh
Sent: Monday, June 28, 2021 4:37 PM
To: 'langtont@gtlaw.com' <langtont@gtlaw.com>; Madeline Pendley <mpendley@levinlaw.com>; Lauren Massey <lmasey@levinlaw.com>
Cc: coatesg@gtlaw.com; lagosa@gtlaw.com; knightch@gtlaw.com; lockardv@gtlaw.com
Subject: RE: Ronald (Sandra) Meeks deposition date

We object to this deposition occurring in person.

Best regards,

Daniel

Daniel Nigh*Shareholder*

Levin, Papantonio, Thomas, Mitchell,
Rafferty & Proctor, P.A.
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Pensacola, FL 32502-5996
850.435.7013 (office)
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dnigh@levinlaw.com



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From: langtont@gtlaw.com <langtont@gtlaw.com>

Sent: Monday, June 28, 2021 2:26 PM

To: Daniel Nigh <dnigh@levinlaw.com>; Madeline Pendley <mpendley@levinlaw.com>; Lauren Massey <lmasey@levinlaw.com>

Cc: coatesg@gtlaw.com; lagosa@gtlaw.com; knightch@gtlaw.com; lockardv@gtlaw.com

Subject: RE: Ronald (Sandra) Meeks deposition date

All,

To follow up on the below, please let us know if you have any objection to us re-noticing this deposition to take place in person. We would notice the deposition to take place in a large conference room, with only the court reporter, videographer, and me present in person (and I am fully vaccinated). We are open to other protocols you may propose to ensure the deposition takes place safely. We could notice this deposition to take place in New Orleans, which appears a very short drive from Ms. Meeks' home in Kenner. Alternatively, we would be open to noticing it for a location in Kenner.

Best,
Tori

From: Langton, Tori (OfCnl-ATL-LT)

Sent: Tuesday, June 15, 2021 7:10 PM

To: 'dnigh@levenlaw.com' <dnigh@levenlaw.com>; 'Madeline Pendley' <mpendley@levinlaw.com>; 'Lauren Massey' <lmasey@levinlaw.com>

Cc: Coates, Gregory (Assoc-NJ-LT) <coatesg@gtlaw.com>; Lagos, Alexandra B. (Shld-MIA-LT) <lagosa@gtlaw.com>; Knight, Cheryl (LegalAsst-Atl-LT) <knightch@gtlaw.com>

Subject: RE: Ronald (Sandra) Meeks deposition date

All,

Apologize for the duplicate email; resending with Daniel's email address corrected.

In accordance with paragraph B(1) of CMO 20 (Dkt. 632) ("Order"), you are advised that I will be the lead questioning attorney during the deposition of Ms. Meeks on July 14. Please note that, in accordance with the Order, this notice is not intended to, and does not, restrict the right of other defense counsel to attend and ask questions at said deposition. As instructed by the Order, please contact us at least 24 hours in advance of the deposition if you wish to confer about the expected attendance at this deposition.

Furthermore, it would be appreciated if you could reply to this email, copying my assistant Cheryl Knight, copied here, by the close of business on **July 2** with the contact information for anyone on Plaintiffs' side who plans to attend. **Please identify whether they will be attending the deposition in person or virtually** so we can ensure accommodations, such as a conference facility, are reserved for all counsel that wish to appear in person. And this will also ensure that we have communicated all attendees to the court reporter with sufficient time for everyone to receive instructions and the invitations.

Additionally, we are following up on the status of the needed proprietary authorizations for collection of additional medical records for Mr. Meeks, sent on June 9. I am also attaching here an additional authorization needed for the collection of records for Mr. Meeks. Given Ms. Meeks' upcoming deposition date, we would appreciate if Ms. Meeks could sign and return these as soon as possible.

Best,
Tori

From: Langton, Tori (OfCnl-ATL-LT)

Sent: Tuesday, June 15, 2021 7:07 PM

To: "Daniel Nigh" <dnigh@levinlaw.com>' <'Daniel Nigh' <dnigh@levinlaw.com>>; Madeline Pendley <mpendley@levinlaw.com>; Lauren Massey <lmasssey@levinlaw.com>

Cc: Coates, Gregory (Assoc-NJ-LT) <coatesg@gtlaw.com>; Lagos, Alexandra B. (Shld-MIA-LT) <lagosa@gtlaw.com>; Knight, Cheryl (LegalAsst-Atl-LT) <knightch@gtlaw.com>

Subject: Ronald (Sandra) Meeks deposition date

All

In accordance with paragraph B(1) of CMO 20 (Dkt. 632) ("Order"), you are advised that I will be the lead questioning attorney during the deposition of Ms. Meeks on July 14. Please note that, in accordance with the Order, this notice is not intended to, and does not, restrict the right of other defense counsel to attend and ask questions at said deposition. As instructed by the Order, please contact us at least 24 hours in advance of the deposition if you wish to confer about the expected attendance at this deposition.

Furthermore, it would be appreciated if you could reply to this email, copying my assistant Cheryl Knight, copied here, by the close of business on **July 2** with the contact information for anyone on Plaintiffs' side who plans to attend. **Please identify whether they will be attending the deposition in person or virtually** so we can ensure accommodations, such as a conference facility, are reserved for all counsel that wish to appear in person. And this will also ensure that we have communicated all attendees to the court reporter with sufficient time for everyone to receive instructions and the invitations.

Additionally, we are following up on the status of the needed proprietary authorizations for collection of additional medical records for Mr. Meeks, sent on June 9. I am also attaching here an additional authorization needed for the

collection of records for Mr. Meeks. Given Ms. Meeks' upcoming deposition date, we would appreciate if Ms. Meeks could sign and return these as soon as possible.

Best,
Tori

From: Lagos, Alexandra B. (Shld-MIA-LT)
Sent: Monday, May 24, 2021 5:31 PM
To: 'Daniel Nigh' <dnigh@levinlaw.com>; Coates, Gregory (Assoc-NJ-LT) <coatesg@gtlaw.com>
Cc: Madeline Pendley <mpendley@levinlaw.com>; Lauren Massey <lmasey@levinlaw.com>
Subject: RE: Ronald Meeks deposition date

Thanks, Daniel. July 14 is best for me. We will serve a notice.

From: Daniel Nigh <dnigh@levinlaw.com>
Sent: Monday, May 24, 2021 5:23 PM
To: Coates, Gregory (Assoc-NJ-LT) <coatesg@gtlaw.com>
Cc: Madeline Pendley <mpendley@levinlaw.com>; Lauren Massey <lmasey@levinlaw.com>; Lagos, Alexandra B. (Shld-MIA-LT) <lagosa@gtlaw.com>
Subject: Ronald Meeks deposition date

EXTERNAL TO GT

Hi Greg,

Ronald Meeks is available for deposition on July 12, 13 or 14. Please let us know if one of these dates work for you.

Best regards,

Daniel

Daniel Nigh

Shareholder

Levin, Papantonio, Thomas, Mitchell,
Rafferty & Proctor, P.A.
316 S. Baylen Street, Suite 600
Pensacola, FL 32502-5996
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850.436.6013 (fax)
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From: coatesg@gtlaw.com <coatesg@gtlaw.com>

Sent: Tuesday, May 18, 2021 11:07 AM

To: Daniel Nigh <dnigh@levinlaw.com>

Cc: Madeline Pendley <mpendley@levinlaw.com>; Lauren Massey <lmasssey@levinlaw.com>; lagosa@gtlaw.com

Subject: RE: Valsartan litigation/Ronald Meeks: Authorization needed

CAUTION: This email
message is **EXTERNAL**.

Counsel,

I'm writing to request for your client to execute and return the attached authorization needed to collect records for Plaintiff Ronald Meeks. Please provide us with signed copies from your client as soon as possible.

Thank you,

Gregory Coates
Associate

Greenberg Traurig, LLP
500 Campus Drive, Suite 400 | Florham Park, NJ 07932-0677
T +1 973.443.3269 | C 201 927 4799
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Associate

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